



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029**

August 14, 2014

U.S. Fish and Wildlife Service
Regional Office
Attn: Mr. Thomas Bonetti
300 Westgate Center Drive
Hadley, MA 01035

Re: Draft Comprehensive Conservation Plan and Environmental Impact Statement for Chincoteague and Wallops Island National Wildlife Refuges (NWR) Chincoteague, Virginia, May 2014
CEQ 20140151

Dear Mr. Bonetti:

In accordance with the National Environmental Policy Act (NEPA) of 1969 and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) has reviewed the subject document. The purpose of the Draft Comprehensive Conservation Plan and Environmental Impact Statement (CCP/EIS) is to provide the refuge manager with a 15-year management plan for the conservation of fish, wildlife, and plant resources and their related habitats, while providing opportunities for compatible wildlife-dependent recreation uses.

The CCP/EIS analyzes three alternatives to managing the 14,032-acre Chincoteague NWR and the 373-acre Wallops Island NWR over the next 15 years:

- Alternative A: Status quo.
- Alternative B (Preferred): Continue to establish habitat and wildlife management strategies but focus them in light of the new goals and vision established by the CCP. This alternative balances habitat management, public use and access, and administration of the refuge.
- Alternative C: Direct staffing and funding towards maximizing habitat and wildlife management strategies. As a result of prioritizing habitat and wildlife management, public use activities and access may be reduced.

Based on our review we rate this DEIS, Lack of Objections (LO). A description of our rating system can be found at <http://www.epa.gov/compliance/nepa/comments/ratings.html>. We suggest additional information be provided describing the project as it relates to climate change and adaptive management. Please see our comments attached to this letter. Thank you for the opportunity to offer



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these comments. Please continue providing copies of future NEPA documentation related to this project to EPA; we look forward to working with you on future projects. If you have any questions, please contact Barbara Okorn at (215)814-3330.

Sincerely,

Barbara Okorn for

Barbara Rudnick
NEPA Team Leader
Office of Environmental Programs



Enclosure
Draft Comprehensive Conservation Plan and Environmental Impact Statement
for Chincoteague and Wallops Island National Wildlife Refuge

Alternatives

- 1) The preferred alternative should be clearly stated in the CCP/EIS. The cover letter and Newsletter announcement specify the preferred alternative.
- 2) Page 2-10 mentions alternative vehicles such as golf carts being allowed on town and refuge roads. Additional information should be provided describing any potential impacts resulting from these vehicles. For example, would additional lanes be needed?
- 3) Alternatives A and C include a shuttle system. The cost for riders should be discussed in the CCP/EIS.
- 4) Page 2-11 states that refuge management would continue to use a phased implementation of the approved alternative identified in the Final EIS/CCP, which will be dependent upon future budget approvals and available funding. This phased approach was established by the Final EIS/Master Plan for the refuge approved in 1992. Additional discussion should be included regarding the phasing and prioritization.
- 5) Page 2-15 states that if the piping plover fledging rate drops below 1.0 chick per pair over a 10-year period, management strategies and prescriptions would be re-evaluated. The 10 year time frame should be explained. Since the goal is to meet recovery goals for the species would a shorter time frame provide better results?
- 6) Page 2-63 should include additional information about the lifeguard housing on Wallops Island NWR.
- 7) Page 2-73 text should be expanded to discuss other areas that may be impacted by climate change and sea level rise in addition to the beach parking and related facilities. It is unclear if future activities to address resiliency will be considered (beach replenishment, marsh stability, etc). Additional NEPA analysis should be conducted for these activities as well.
- 8) Page 2-73 please consider expanding the last bullet. What is involved in the pursuit of designation from the Department of Interior to be a pilot site for mitigation research, such as testing the impacts of renewable energy on wildlife? Will there be additional NEPA documentation for these activities?
- 9) Page 2-77 states that the relocated beach parking for Alternative C will be in a less sensitive area for wildlife habitat. Is this true for the parking area for Alternative B as well? They appear to be in the same location on the maps.
- 10) While we recognize that additional NEPA analysis will be conducted for the relocated beach and parking area, it would be helpful to provide additional information about how the beach will be constructed, material used, protection, etc. Temporary impacts should also be considered.
- 11) Page 2-83 discusses the shuttle service. The shuttle should avoid idling time to minimize air quality impacts.

Affected Environment

- 1) This section should discuss wetlands and other aquatic resources in detail. The CCP/EIS only discusses the impoundments.



- 2) Page 3-87 states that “each time a strong coastal storm hits Assateague Island, the island rolls over on itself, moving the island in a westward direction. This is a normal barrier island response to coastal storms and sea level rise. When this happens, the bayside wetlands immediately adjacent to the island are covered with sand that has washed across the island; this provides a new upland site on which to rebuild the parking lots that were destroyed. However, a new wetland/upland boundary has to be determined so the new parking lost is aligned with the new upland.” Please consider all appropriate regulations to protect aquatic resources and sensitive buffer areas. We suggest coordination with the U.S. Army Corps of Engineers.

Environmental Consequences

- 1) Page 4-7 states that pollutants from vehicle emissions, oils, and coolants that leak out and collect in the parking area could eventually be washed into the adjacent water systems which would flow south to Toms Cove. This occurrence would be largely confined to the summer months when beach traffic would be at its highest, and would be mitigated through best engineering practices. In addition to addressing potential contamination, future activities under the plan should be consistent Section 438 of the Energy Independence and Security Act, and Executive Order 13148 regarding stormwater runoff from development.
- 2) The EIS states that there will be wetland impacts resulting from the relocation of the recreational beach and parking area for Alternatives B and C. Efforts should be made to avoid and minimize impacts to natural resources, including aquatic resources from any activity associated with this CCP/EIS. In addition permits may need to be obtained as well as a mitigation plan for unavoidable impacts. Additional information should be provided about these habitats and impacts.
- 3) Based on the information presented it is unclear what benefit comes from the Over-Sand Vehicle access in Alternative B. There appear to be many benefits to species of concern and habitat by further limiting or eliminating their use. Additional information should be provided and analyzed.

